

April 10, 2006

Office of General Counsel  
Federal Election Commission  
999 E Street NW  
Washington DC 20463

MUR # 5734

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2006 APR 17 A 11:31

Greetings:

This letter serves as formal notice to the Federal Election Commission that the candidate for Colorado's 4<sup>th</sup> Congressional House Seat, Angela "Angie" Paccione and her campaign committee violated FEC rules by offering paid vacations and non-campaign related trips to those who raise and contribute funds to her campaign, as well as failing to disclose who paid for campaign communications.

On or about February 23<sup>rd</sup> 2006, Ms. Paccione sent out a mass email offering vacation trips and/or non-campaign related trips (specifically, travel to Washington, D.C. for her "swearing-in ceremony"), and dinners or entertainment among other things of value for contributions to her campaign committee. The minimum amount a donor needed to raise was \$5,000 in order to be eligible for these prizes.

The Federal Election Commission is clear that it is unlawful for any candidate to pay for any vacation trips other than campaign related, with campaign funds. Any attempt to do so would be in direct violation of FEC rules 113.1(g)(1)(ii)(C), CFR 113.1(g)(1)(i)(J) and 439 a.(b). Civil penalties which the commission may impose for such violations are \$5000.

FEC rule 439 a.(b) states that a contribution or donation shall be considered to be converted to personal use if the contribution or amount is used to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate's election campaign or individual's duties as a holder of Federal office, including (E) a vacation or other noncampaign-related trip.

FEC rules 113.1(g)(1)(ii)(C), CFR 113.1(g)(1)(i)(J) also prohibits candidates from using campaign funds in this manner.

Paccione's email also failed to disclose who paid for the communication. This is in direct violation of FEC rule 441 d, regarding publications of statements and solicitations. FEC law is clear that it is unlawful for any candidate to distribute a solicitation for funds without also disclosing to the recipient who initially paid for said publication, solicitation or statement.

Ms. Paccione's fundraising email is in direct violation of FEC rules. Paccione has made no attempt to clarify her intentions in a timely manner with the Federal Election Commission and should thus be subject to a FEC investigation and appropriate penalties.

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A copy of the email communication is attached.

Sincerely,

*Ron Buxman*

Ron Buxman

NOTARY PUBLIC CERTIFICATION

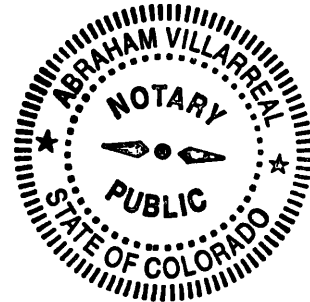
Signed and sworn to before me this 10 day of April, 2006.

X *Abraham Villarreal*

Print Name: ABRAHAM VILLARREAL

Notary Public in and for WELD County, State of Colorado.

My commission expires: 11-16-09



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